

**Thomaston Compressor Station**  
**Appendices**  
**Table of Contents**

1	Facility Information .....	1
2	Revision History .....	2
3	OGI Certifications .....	3
4	Site Map and Observation Path.....	6
5	Plan for Difficult-to Monitor (DTM) and Unsafe-to-Monitor (UTM) Components .....	20
6	State-specific Monitoring Requirements .....	21

# 1 Facility Information

Kinder Morgan owns and operates the Southern Natural Gas – Thomaston Compressor Station located in Thomaston, Upson County, Georgia. The Thomaston Compressor Station currently operates under the Part 70 Operating Permit issued on April 17, 2012 and modified on September 29, 2015. The Thomaston Compressor Station is currently authorized to operate three (3) natural gas-fired, 2-stroke, lean burn compressor engines rated at 4,000 HP; two natural gas-fired, 4-stroke, lean burn compressor engines rated at 4,730 HP, one small natural gas-fired boiler, one small natural gas-fired heater, and two natural gas-fired emergency electric generators.

The Southern Natural Gas Thomaston, GA compressor station (Thomaston Facility) must comply with the monitoring and repair requirements set forth in the 40 CFR 60 Subpart OOOOa. The purpose of this appendix is to give a detailed account of how the Thomaston Facility will comply with the Fugitive Emissions Monitoring Plan.

Monitoring at Thomaston Compressor Station will occur on a quarterly basis (60.5397a(g)(1)). The Operator will be a trained infrared thermographer and will perform the surveys using OGI, specifically with a FLIR GF-320 camera. This camera meets the 60.5397a (c)(7) OGI requirements. If a GF-320 camera is not available, other cameras that can identify fugitive emissions will be used.

The requirements of 60.5397a (c)(7) state that a daily verification check must be performed. Prior to starting the survey, the Operator will perform the daily verification check to ensure that the camera can properly identify fugitive emissions during the survey. The atmospheric conditions, maximum viewing distance, wind speed, and other factors will be noted during the daily verification check.

Once a fugitive emission is identified by the Operator, it will be flagged with a leak tag. The date, component type, and a description of the emission will be noted on the tag. Thomaston Facility personnel will be notified and will immediately make a first attempt of repair. If a repair is made, the Operator will re-survey the repaired component to verify if the repair was made. If an immediate repair cannot be made during the survey, the Thomaston Facility will make a first attempt as soon as practical but no later than 30 days after the date of the survey. Once this repair is made, Thomaston Facility personnel will perform a re-survey on the leaking component using a soap and water solution. If there are no observable bubbles, the leak will be noted as repaired. If bubbles do exist, additional repair attempts will be made until no bubbles are observed. Thomaston Facility personnel will decide if a repair is technically infeasible or if a facility blowdown must occur to repair the component.

If a leak cannot be immediately repaired and verified to be free of leaks during the survey, then all information for the leak will be entered by Thomaston Facility personnel into their MAXIMO leak tracking database. The Operator will work with Thomaston Facility personnel to document that all repairs are made within 30 days of the survey and that re-surveys are made within 30 days 60.5397a(h)(3) to verify the repairs were made.

If the repair or replacement is technically infeasible, would require a blowdown, a compressor station shutdown, or would be unsafe to repair during operation of the unit, a delay of repair record will be generated and tracked in MAXIMO to ensure that the leak is repaired during the next scheduled compressor station shutdown or after a planned blowdown, or within 2 years, whichever is earlier.

All records associated with OOOOa compliance shall be kept for five years.

## 2 Revision History

Version #	Date	Modifications
1	2017-04-17	Developed plan
2	2019-07-17	Updates to plan to add state-specific data

### **3 OGI Certifications**

Fugitive monitoring surveys will be performed by a third-party contractor or by an in-house technician.

Attached are the training and experience records for technicians who perform OGI monitoring at the Thomaston Compressor Station.



# VERIFICATION OF ATTENDANCE

THIS CONFIRMS THAT

***JARED WALTON***

HAS ATTENDED

**OPTICAL GAS IMAGING TRAINING**

A 3 DAY INSTRUCTOR LED COURSE

**JUNE 5 - 7, 2018**



NASHUA, NEW HAMPSHIRE, USA

ITC CERTIFICATION RENEWAL CREDITS: 20  
2.0 CEUS; 20 PDH's

INSTRUCTOR

PUB ITC 111 M, 2016-04-08



## Certificate of Completion

This certifies that

**Jared Walton**

has completed the

0.5 hour online course

**WEB-IR50 - FLIR GF Camera Operation Basics**

**May 31, 2018**

Infrared Training Center  
9 Townsend West  
Nashua, NH 03063

## 4 Site Map and Observation Path

60.5397a (d)(1-2) dictates that a site map and a defined observation path must be included in the Plan. In order to more easily show the observation path that will be used during the surveys, aerial photographs of the site were taken (see Table 1). Different areas of the facility are shown, as are the observation path for each area. No deviations were noted during the initial setup; however, any deviations that may occur during the surveys will be noted, as well as the reason for the deviation and the corrective action that was taken.



Area Border



ENVIRONMENTAL<sup>360</sup>

**KINDER MORGAN**


Thomaston, GA Compressor Station  
Fugitive Emissions Site Layout Map


March 2017

Figure 1

ED\_004016L\_00001900-00008



Observation  
Path      

Area Border      



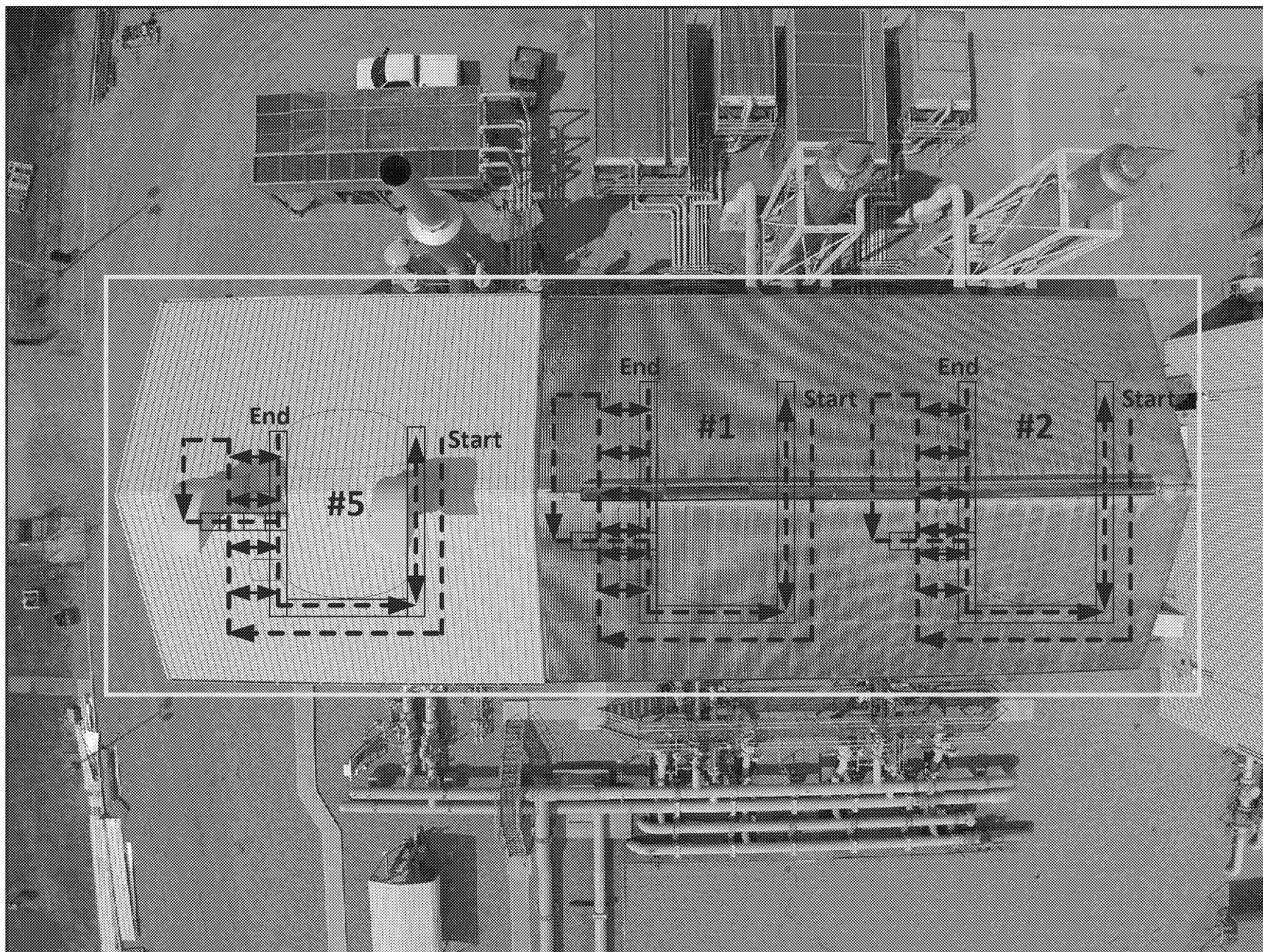
**KINDER MORGAN**

Thomaston, GA Compressor Station  
Area 1 -

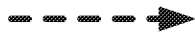
March 2017

Figure 1





Observation  
Path



Area Border



ENVIRONMENTAL<sup>360</sup>

**KINDER MORGAN**

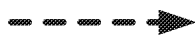
Thomaston, GA Compressor Station  
Area 2A – Operating Floor

March 2017

Figure 2A



Observation  
Path  
Area Border



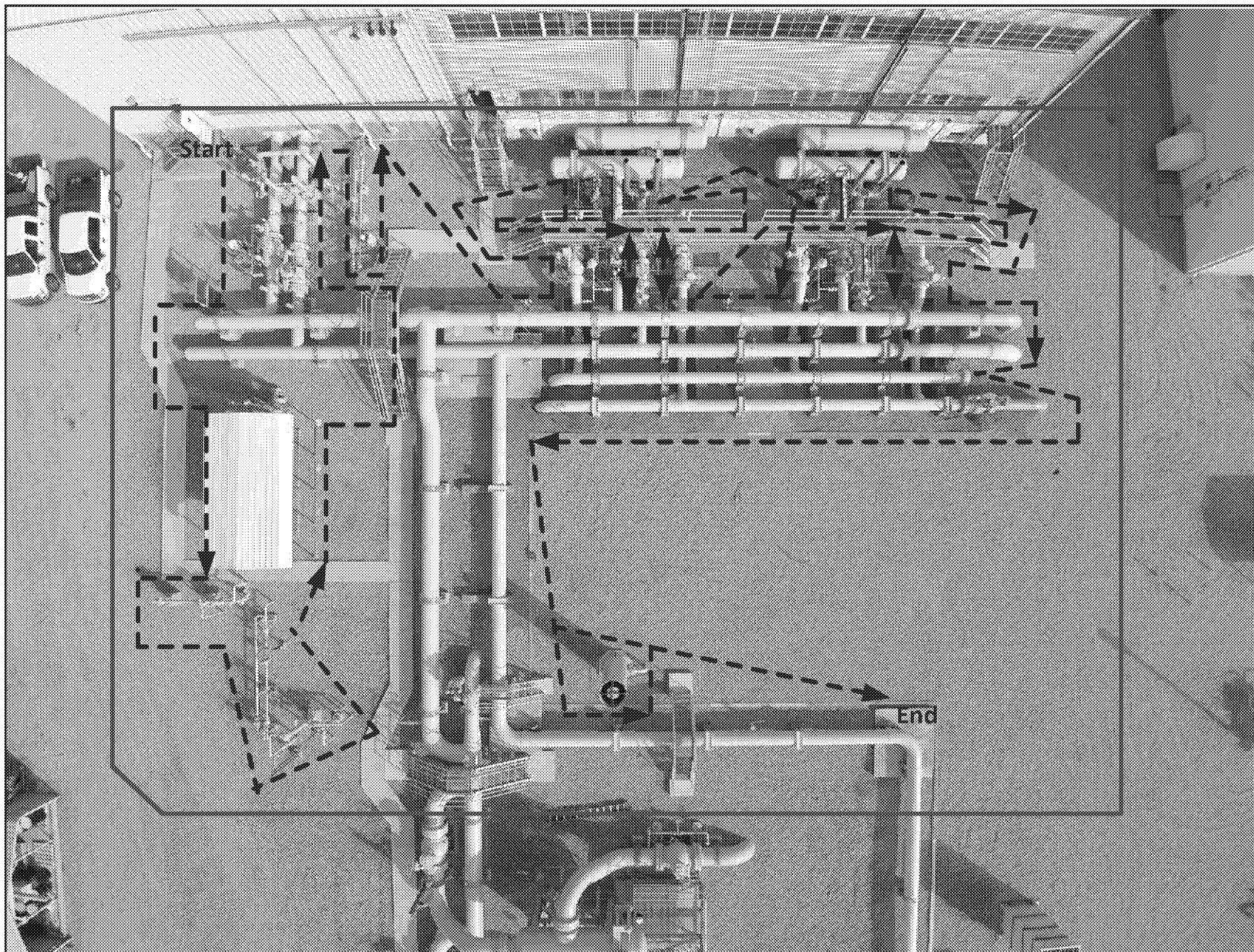
ENVIRONMENTAL<sup>360</sup>



**KINDER MORGAN**

Thomaston, GA Compressor Station  
Area 2B - Basement

March 2017

Figure 2B



Observation  
Path   
Area Border 



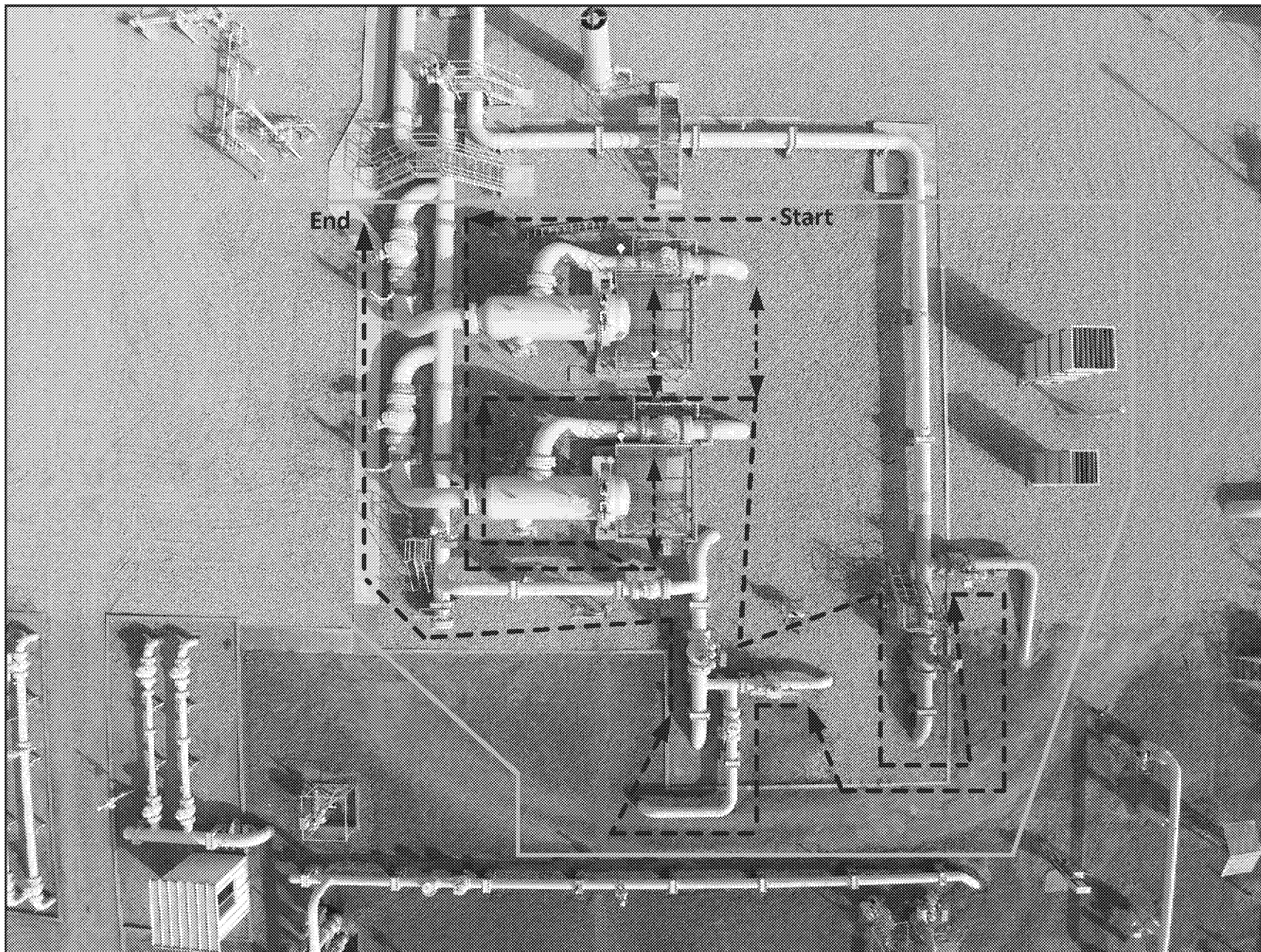
**KINDER MORGAN**

Thomaston, GA Compressor Station  
Area 3 -

March 2017

Figure 3

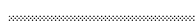




Observation  
Path



Area Border



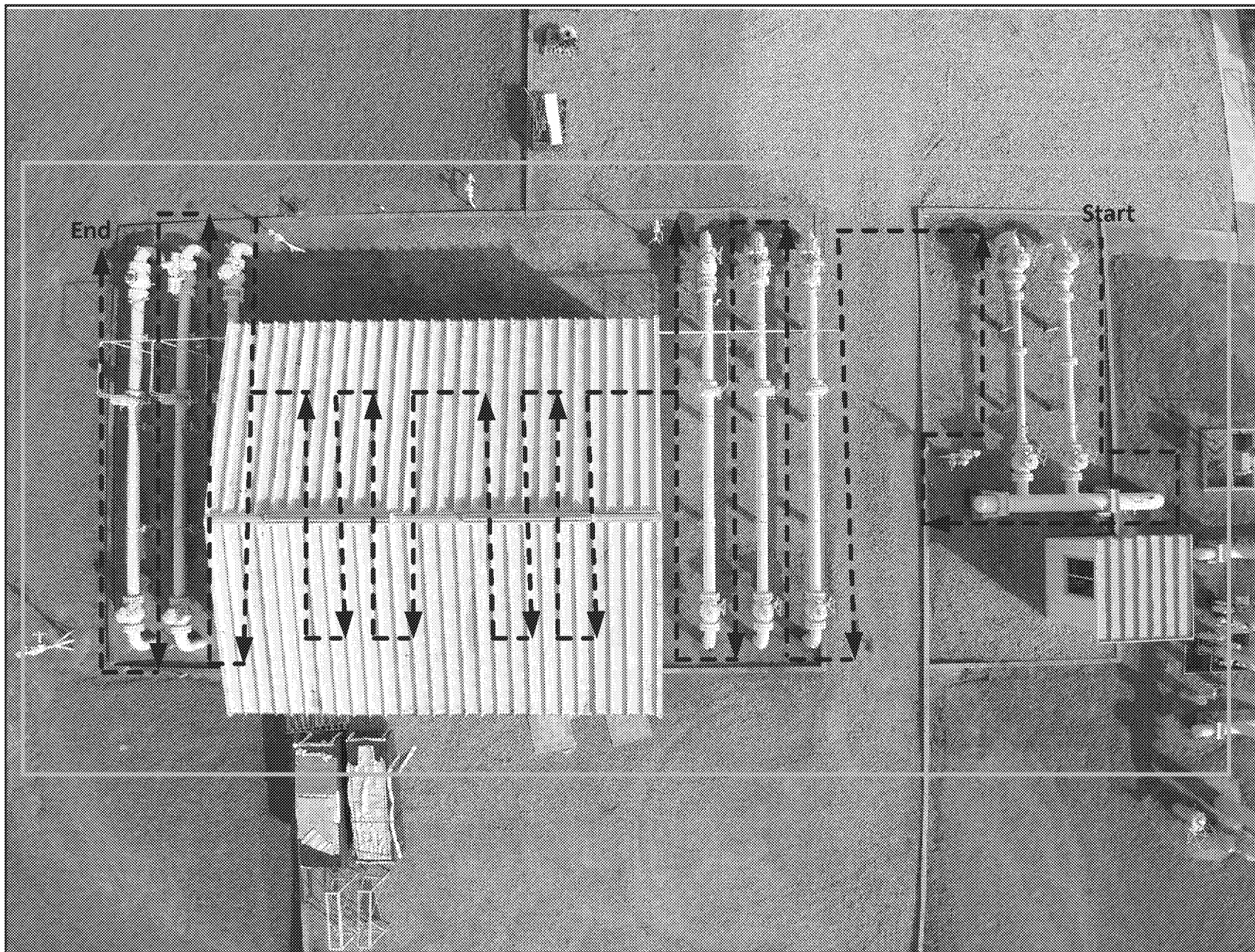
ENVIRONMENTAL<sup>360</sup>

**KINDER MORGAN**

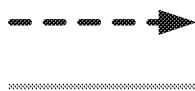
Thomaston, GA Compressor Station  
Area 4-

March 2017

Figure 4



Observation  
Path  
Area Border



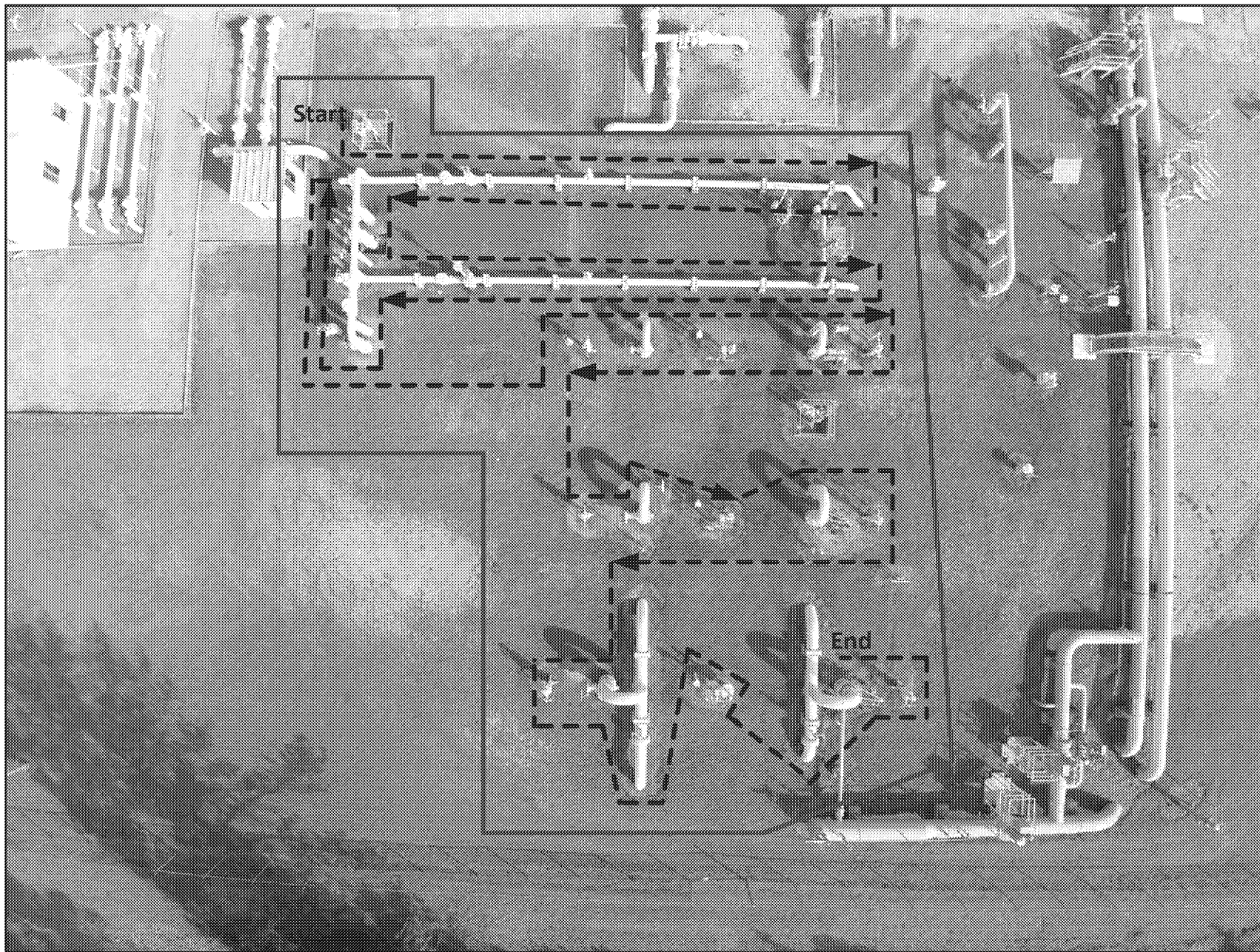
ENVIRONMENTAL<sup>360</sup>

**KINDER MORGAN**

Thomaston, GA Compressor Station  
Area 5 -

March 2017

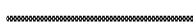
Figure 5



Observation  
Path



Area Border



ENVIRONMENTAL<sup>360</sup>

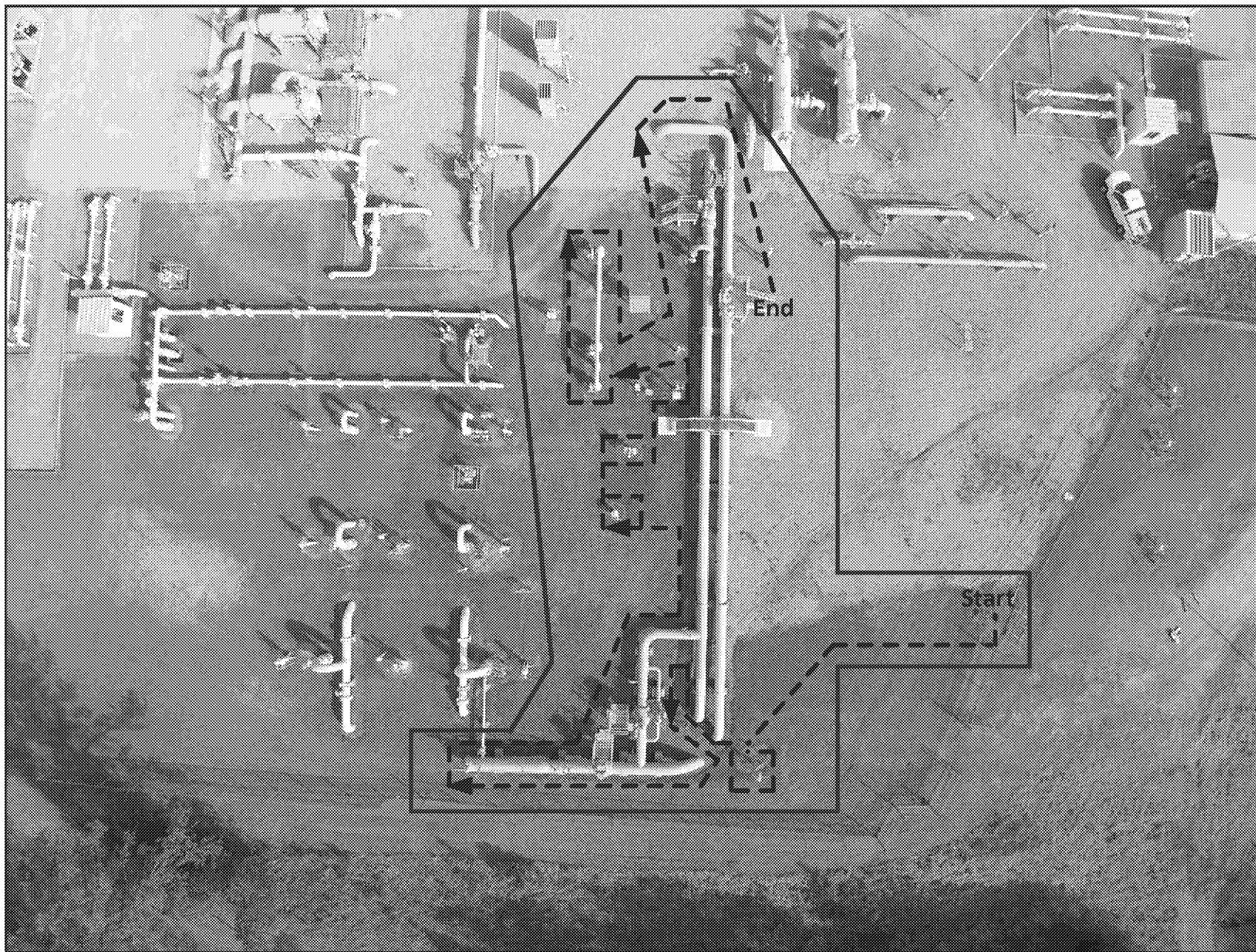
**KINDER MORGAN**

Thomaston, GA Compressor Station  
Area 6 -

March 2017

Figure 6





Observation  
Path      - - - - - ➔

Area Border      —————




**KINDER MORGAN**

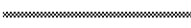
Thomaston, GA Compressor Station  
Area 7 -

March 2017

Figure 7



Observation  
Path 

Area Border 

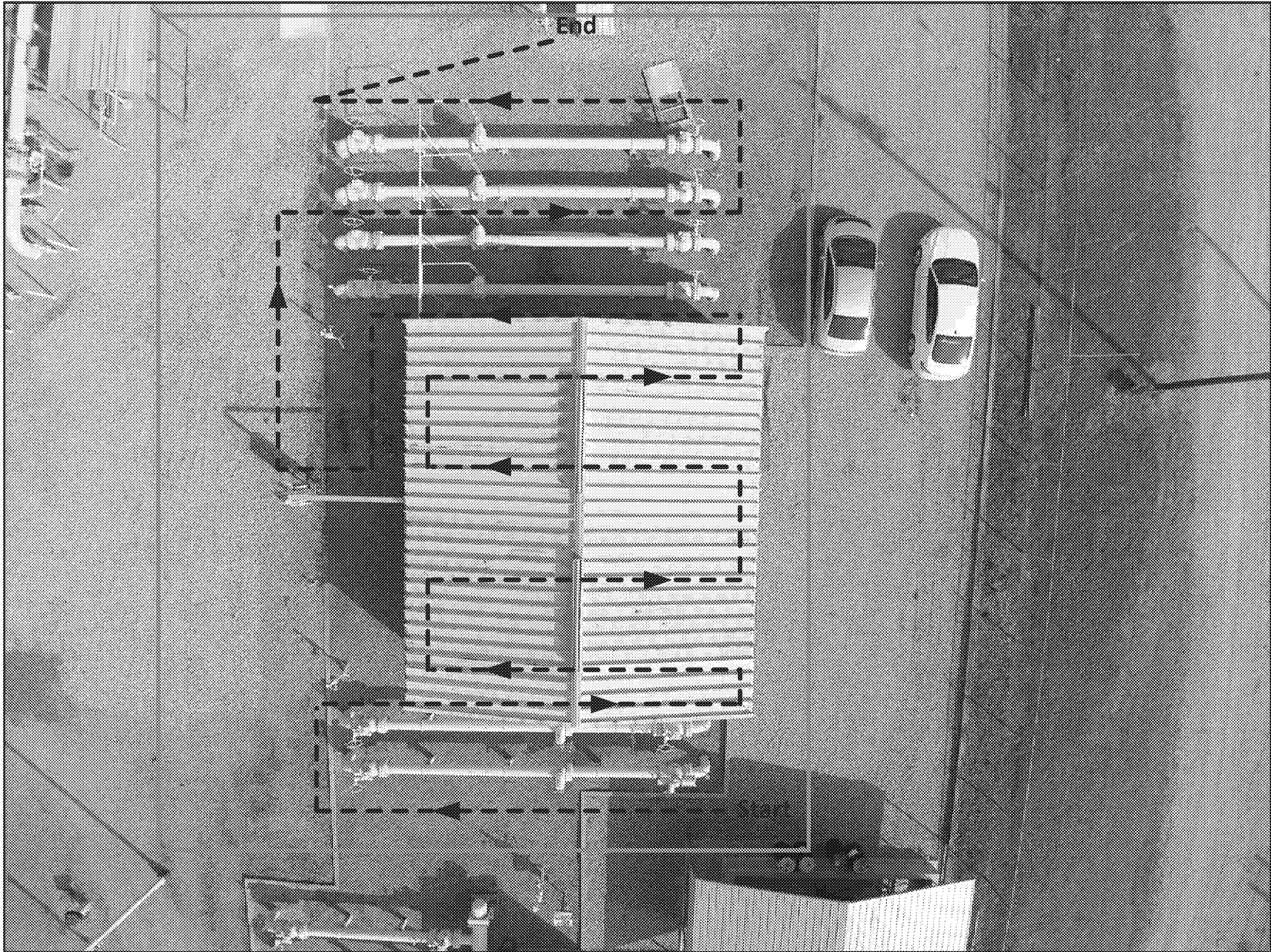


**KINDER MORGAN**

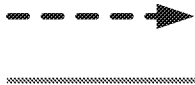
Thomaston, GA Compressor Station  
Area 8 -

March 2017

Figure 8



Observation  
Path  
Area Border



ENVIRONMENTAL<sup>360</sup>

**KINDER MORGAN**

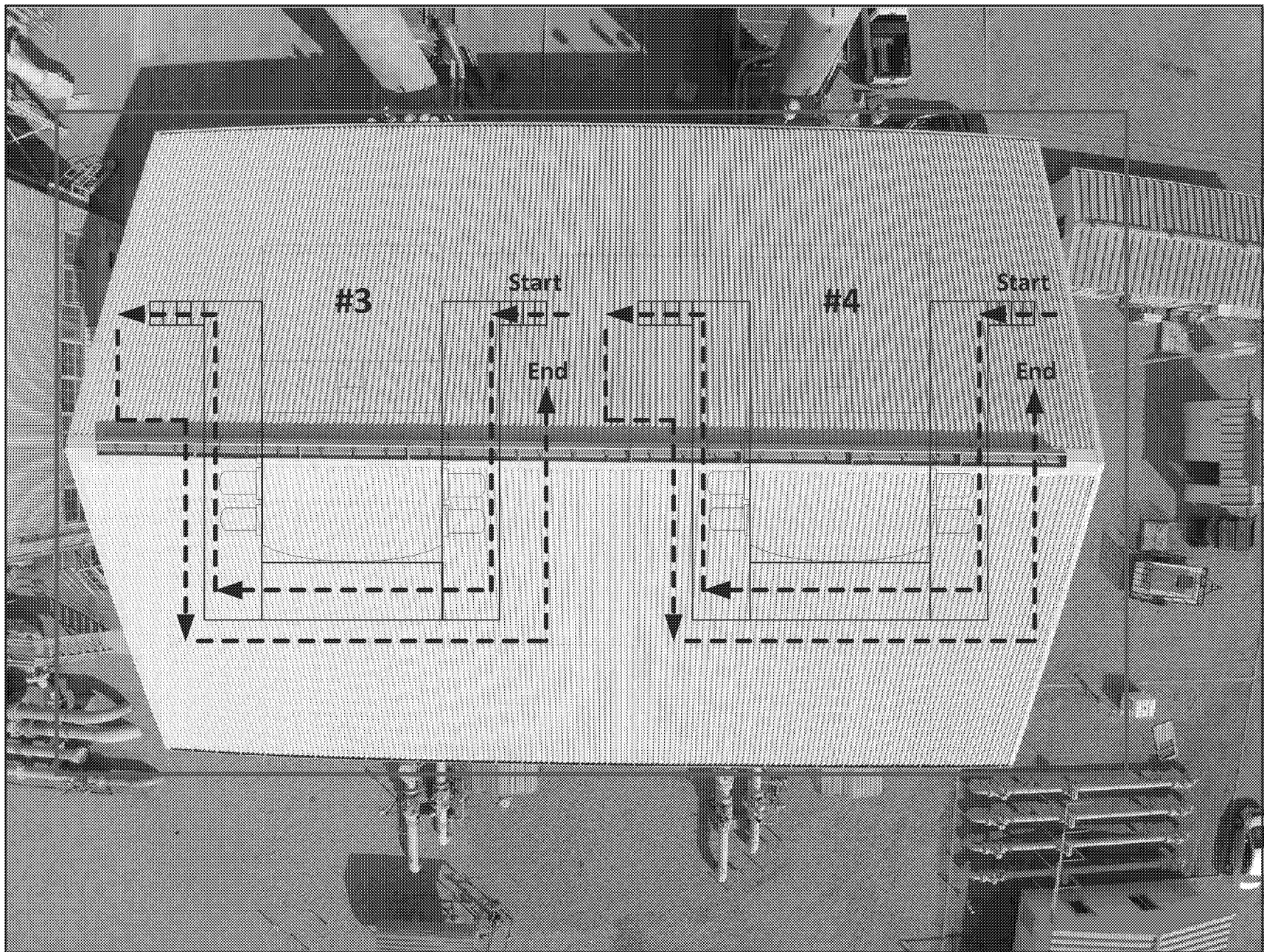
Thomaston, GA Compressor Station  
Area 9 -

March 2017

Figure 9







Observation  
Path



Area Border



ENVIRONMENTAL<sup>360</sup>

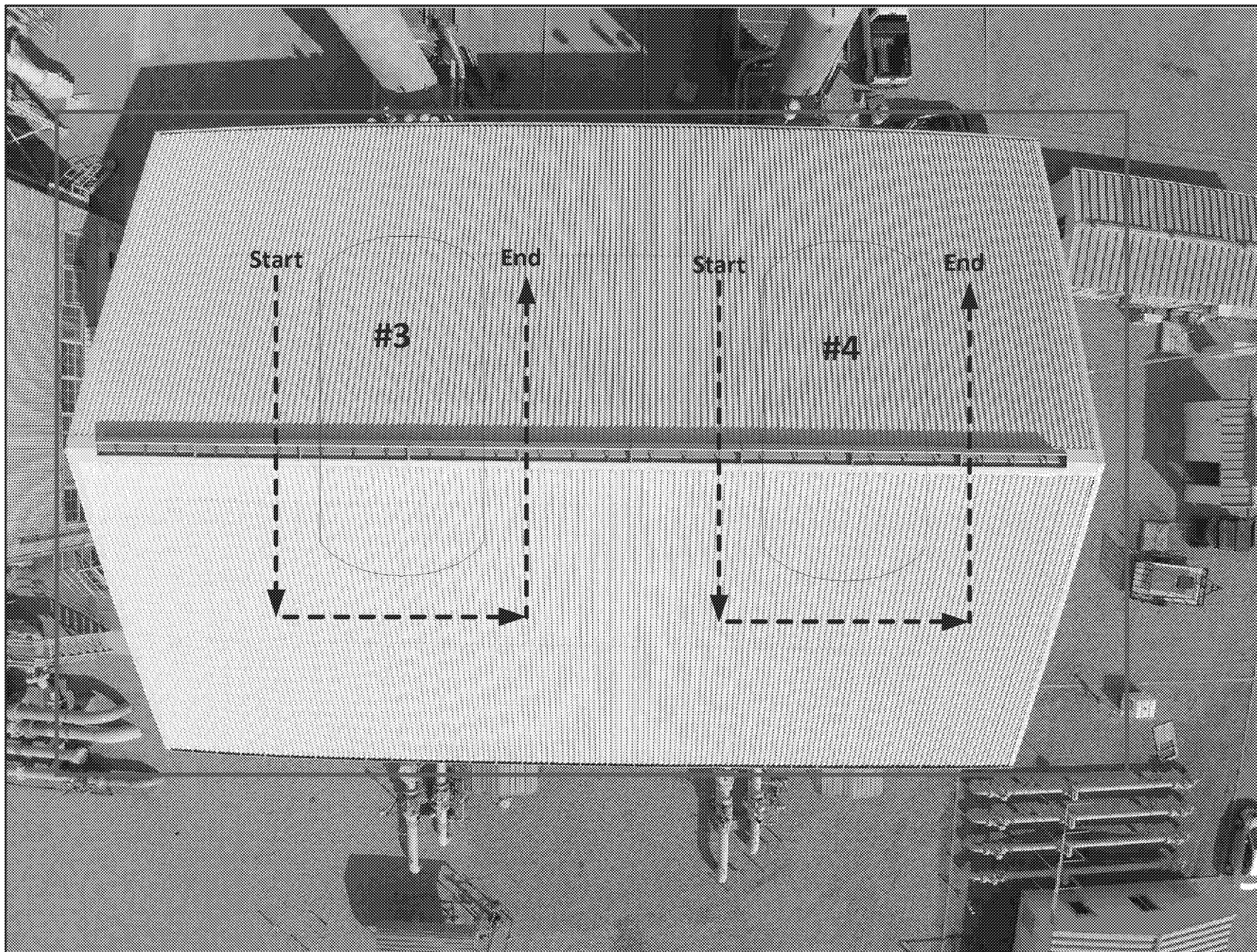
**KINDER MORGAN**

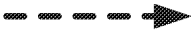
Thomaston, GA Compressor Station  
Area 11 – Operating Floor


March 2017

Figure 11A





Observation  
Path 

Area Border 



**KINDER MORGAN**

Thomaston, GA Compressor Station  
Area 11 - Basement

March 2017

Figure 11B

## **5 Plan for Difficult-to-Monitor (DTM) and Unsafe-to-Monitor Components**

60.5397a (d)(4) states that any components that are designated as DTM or UTM must be identified as to why they are DTM or UTM and must be monitored at least once per year. The Thomaston Facility has not identified any components as DTM or UTM.

## **6 State-specific Monitoring Requirements**

At this time, the state of Georgia has no applicable OOOOa requirements, so this is not applicable.